

STANDARD TORT CLAIM FORM

General Liability Claim Form (SF 210)

For Official Use Only

Pursuant to Chapter 4.92 RCW, this form is for filing a tort claim against the Bellingham School District. Some of the information requested on this form is required by RCW 4.92.100 and may be subject to public disclosure. Standard Tort Claim forms cannot be submitted electronically (via email or fax).

PLEASE TYPE OR PRINT IN INK

Mail or deliver to: Bellingham School District #501
Attention: Superintendent
1306 Dupont Street
Bellingham, Washington 98225

Business Hours: Monday – Friday 8:00 a.m. – 5:00 p.m.
Closed on weekends and holidays.

1. Claimant's name: Goodwin Danielle H [REDACTED]
Last name First Middle Date of birth (mm/dd/yyyy)
2. Current residential address: _____
3. Mailing address (if different): C/O Cedar Law PLLC 1001 Fourth Ave, Suite 4400 Seattle, WA 98154
4. Residential address at the time of the incident: (if different from current address) _____
5. Claimant's daytime telephone number: [REDACTED] [REDACTED]
Home Business or Cell
6. Claimant's e-mail address: C/O shannon@cedarlawpllc.com
7. Date of the incident: 09/16/2019 Time: 9:00 ☒ AM ☐ PM (check one)
(mm/dd/yyyy)
8. If the incident occurred over a period of time, date of first and last occurrences:
from _____ Time: _____ ☐ AM ☐ PM through _____ Time: _____ ☐ AM ☐ PM
(mm/dd/yyyy) (mm/dd/yyyy)
9. Location of incident: Whatcom County, WA Bellingham Whatcom Middle School
State and county City, if applicable Place where occurred
10. If the incident occurred on a street or highway:
N/A
Name of street or highway Milepost number Nearest intersecting street
11. State agency or department alleged responsible for damage/injury: Bellingham School District
12. Names, addresses and telephone numbers of all persons involved in or witness to this incident:
See attached
13. Names, addresses and telephone numbers of all employees having knowledge about this incident:
See attached
14. Names, addresses and telephone numbers of all individuals not already identified in #12 and #13 above that have knowledge regarding the liability issues involved in this incident, or knowledge of the Claimant's resulting damages.

Please include a brief description as to the nature and extent of each person's knowledge. Attach additional sheets if necessary.

See attached

15. Describe the cause of the injury or damages. Explain the extent of property loss or medical, physical or mental injuries. Attach additional sheets if necessary.

See attached

16. Has this incident been reported to law enforcement, safety or security personnel? If so, when and to whom? Please attach a copy of the report or contact information.

Bellingham Police Department, 17B-38028 Sex Crime

17. Names, addresses and phone numbers of treating medical providers. Attach copies of all medical reports/billings.

Theses will be provided at a later date.

18. Please attach documents which support the allegations of the claim.

19. I claim damages from the Bellingham School District in the sum of \$ An amount to be proven at trial

This Claim form must be signed by the Claimant, a person holding a written power of attorney from the Claimant, by the attorney in fact for the Claimant, by an attorney admitted to practice in Washington State on the Claimant's behalf, or by a court-approved guardian or guardian ad litem on behalf of the Claimant.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signature of Claimant

Date and place (residential address, city and country)

Or

Signature of Representative

10/2/2019 1001 4th Ave, Ste. 4400 Seattle, Washington,
USA
Date and place (residential address, city and country)

Shannon McMinimee

Print Name of Representative

34471

Bar Number (if applicable)

12. and 13. Danielle Goodwin, contact through counsel
Lucas Goodwin, contact through counsel
[REDACTED]
Rebecca Mallahen, BSD employee
The students present in the BRIDGES Classroom on September 16, 2019
The paraeducator assigned to serve Lucas Goodwin the BRIDGES Classroom Bathroom
Greg Baker, BSD employee
Steve Clark, BSD employee
Jeff Coulter, BSD employee
Tina Allsop, BSD employee
Kristine Tice, BSD employee
Bob Kuhel, BSD employee
Nicole Talley, BSD employee
Detective Keith Johnson, Bellingham Police Department, Police Department
505 Grand Avenue, Bellingham, WA 98225, Phone: (360) 778-8800
Lynette Basich, 601 Union St Ste 800, Seattle, WA 98101 Phone: (206) 622-0203
Besty Bede, contact information unknown

14. and 15. Lucas and [REDACTED] Goodwin were sexually assaulted by BSD employee [REDACTED]
[REDACTED] used [REDACTED] position as Lucas' special education teacher to groom Lucas and [REDACTED]
[REDACTED] as well as Lucas and [REDACTED] Lucas experienced unwanted sexual
contact in the classroom and was subject to other conduct and behavior by [REDACTED] that
reflected that [REDACTED] was grooming him for sexual contact. [REDACTED] violated numerous BSD
Procedures with respect to Goodwin family, including its Sexual Harassment,
Nondiscrimination, and Maintaining Appropriate Staff/Student Boundaries. The BSD,
through its administrative staff, initially discounted the reports of [REDACTED] conduct.
Then the BSD retained a school district defense attorney, Lynette Baisch, who lacked
appropriate training and expertise to investigate the allegations against [REDACTED] Ms.
Baisch conducted an inadequate and insufficient investigation, failing to even interview
[REDACTED] and Lucas Goodwin. The Bellingham Police Department subsequently investigated
the matter and believed that it was more probable than not that the allegations against [REDACTED]
[REDACTED] were true.

On September 16, 2019, Lucas was placed in a bathroom within his classroom to receive
his education. This was an outrageous action that was discriminatory based on his having
disabilities. Further, it was done as retaliation against Danielle and Lucas Goodwin for
their previously having reported [REDACTED] sexual abuse of Lucas and [REDACTED] Goodwin.
Lucas's teacher expressly stated that she was requiring Lucas to be in the bathroom
because of the prior reports of the sexual misconduct of [REDACTED]

Danielle, Lucas, and [REDACTED] Goodwin have all experienced medical and emotional damages
as a result of the actions and inactions of the BSD, its staff, and its contractor (Ms.
Baisch).